PROCESS—IMMUNITY FROM SERVICE—NONRESIDENT TRUSTEE IN BANKRUPTCY.—The defendant, a nonresident, was appointed trustee of a bankrupt's estate by the U. S. District Court for the District of Kansas. While present in Kansas to make a sale authorized by the bankruptcy court, he was served with process in the present suit. His motion to quash service on the ground that he was immune from process while attending the sale was denied, and judgment was entered against him. *Held,* that the judgment was erroneous, as the nonresident trustee was immune from service. *Eastern Kansas Oil Co. v. Beutner* (1917, Kan.) 167 Pac. 1061.

This is a novel, but, it is believed, a sound, application of the principle which, in the interests of judicial administration, exempts nonresident parties, witnesses and attorneys in attendance upon court from liability to civil process in another suit. See *Powell v. Pangborn* (1914, Sup. Ct.) 145 N. Y. Supp. 1073, 161 App. Div. 453; *Stewart v. Ramsay* (1916) 242 U. S. 128, 37 Sup. Ct. 44. But compare *Greenleaf v. Peoples Bank* (1903) 133 N. C. 292, 45 S. E. 638; *Brooks v. State* (1911, Del.) 3 Boyce 1, 79 Atl. 790.

WATERS AND WATER COURSES—PERCOLATING WATERS—"REASONABLE USER" DOCTRINE.—For the purpose of supplying the City of Ann Arbor and its inhabitants with water the city sank wells and erected a pumping station upon land which it owned. Its pumping operations caused wells upon the plaintiff's land to become dry. *Held,* that the plaintiff was entitled to damages. *Schenk v. City of Ann Arbor* (1917, Mich.) 163 N. W. 109.

The court rejected the English rule concerning the withdrawal of percolating waters (which was carried to an extreme in *Mayor v. Pickles* [1895] A. C. 587) and adopted the rule of "reasonable user" of which New Jersey and New York decisions are the chief exponents.

WORKMEN'S COMPENSATION ACT—INJURY "ARISING OUT OF" EMPLOYMENT—PERIL ATTACHED TO PARTICULAR LOCATION.—There being no sanitary convenience for women in the respondent's factory, he made arrangements whereby the claimant, the only woman in his employ, might have access to the conveniences on adjacent premises belonging to another employer. It was necessary to cross a yard to reach the other factory and, while so doing, the claimant slipped on a very small piece of wood lying on the ground. Her fall resulted in serious injuries, for which compensation was claimed under the Act. *Held,* that the injury resulted from a peril to which the claimant was exposed by obligation of her contract of service, and hence was one "arising out of" her employment. *Fearnley v. Bates etc. Ltd.* (1917, C. A.) 117 L. T. 193.

The court felt itself driven to this decision by the case of *Thom v. Sinclair* [1917] A. C. 127. The new rule which that case established as to the character of causation required to satisfy the Act, was discussed in (1917) 27 YALE LAW JOURNAL 143.